

**NEW YORK** 

99 Madison Avenue, 8<sup>th</sup> Floor New York, New York 10016

Tel (212) 271-0664 Fax (212) 271-0665

michaelyi@lacwkrr.com www.lacwkrr.com

November 18, 2021

## **VIA CM/ECF**

Hon. Susan D. Wigenton
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101
Telephone: (973) 645-5903

Re: Zeikos Inc. v. Walgreen Co.

2:21-cv-19993-SDW-MAH

Dear Judge Wigenton:

Our firm is counsel to Walgreen Co. ("Walgreens"), defendant in the referenced action.

We are submitting herewith a proposed Stipulation and Order (the "Stipulation"), executed by the parties' counsel, pursuant to which our firm will accept service of the Summons and Complaint on behalf of Walgreens and Walgreens' time to respond to the Complaint will be extended to December 17, 2021. There has been no previous request for such an extension.

We respectfully request that the Stipulation be so-ordered at the Court's earliest convenience.

Michael M. Yi

Respectfully

cc (via CM/ECF): Laura Scileppi, Esq.

| Michael M. Yi                |
|------------------------------|
| LEE ANAV CHUNG WHITE         |
| KIM RUGER & RICHTER LLP      |
| 99 Madison Avenue, 8th Floor |
| New York, New York 10016     |
| Telephone: (212) 271-0664    |
|                              |
| Attorneys for Defendant      |

UNITED STATES DISTRICT COURT

Attorneys for Defendant Walgreen Co.

| Plaintiff              | STIPLILATION AND ORDI |
|------------------------|-----------------------|
| ZEIKOS INC.,           | 2:21-cv-19993-SDW-MAH |
| X                      |                       |
| DISTRICT OF NEW JERSEY |                       |
|                        |                       |

v.

WALGREEN CO.,

| Defendant. |
|------------|
| <br>X      |

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff Zeikos Inc. and defendant Walgreen Co. ("Walgreens"), by their respective undersigned counsel, as follows:

- 1. Walgreens' attorneys, Lee Anav Chung White Kim Ruger & Richter LLP, pursuant to authorization from Walgreens, shall receive service of plaintiff's Summons, dated November 16, 2021, and Complaint, dated November 15, 2021 (the "Summons and Complaint"), on behalf of Walgreens.
- 2. Receipt of such service of the Summons and Complaint by Walgreens' attorneys shall not be deemed a waiver of any of Walgreens' rights, claims, or defenses in this action (other than the defense of insufficiency of service of process with respect to the Summons and Complaint).

- 3. The time for Walgreens to answer, move, or otherwise respond to the Complaint shall be extended to and including December 17, 2021.
- 4. Facsimile signatures of the parties' respective undersigned counsel shall be deemed to be original.

Dated: November 17, 2021

**DUNNEGAN & SCILEPPI LLC** 

By:

Laura Scileppi

437 Madison Avenue, 24<sup>th</sup> Floor New York, New York 10022 (212) 332-8304

Attorneys for Plaintiff Zeikos Inc.

LEE ANAV CHUNG WHITE KIM RUGER & RICHTER DA

By.

Michael M. Yi

99 Madison Avenue, 8<sup>th</sup> Floor New York, New York 10016 (212) 271-0664

Attorneys for Defendant Walgreen Co.

SO ORDERED:

Hon. Susan D. Wigenton, U.S.D.J.